

REMARKS

Claims 1 to 19 were pending in the application at the time of examination. Claims 1 to 19 stand rejected as anticipated.

Applicants note that the assignee for the above application has transferred responsibility for the application to the undersigned attorney. Please address all future correspondence in the above application to the undersigned attorney. A revocation of attorney and appointment of new attorney has been filed and entered by the USPTO.

Applicants have amended the description to correct grammatical errors.

Applicants note that no § 112 rejections have been presented in the office action. Accordingly, in the view of the Examiner, the claims complied with all § 112 requirements. As described more completely below, some of the claims are amended to address informalities. Since only informalities are being corrected, the amendments do not affect the patentability of the claims.

Claims 1, 4, and 7 and Claims 2, 5, and 8 are amended to correct an antecedent basis informality with respect to the user.

Claims 3, 6, and 9 are amended to correct an antecedent basis informality with respect to the service portal and to cast the claims as a complete sentence by adding "and" after the next to last element. Claim 9 is also amended so that each element recites "means for."

Claims 11, 14 and 17 are cancelled without prejudice to filing a continuation application.

Claim 16 is amended so that each element recites "means for."

Claims 1 to 18 stand rejected under 35 U.S.C. § 102(b) as being anticipated by V. Samar, "Single Sign-On Using Cookies

for Web Applications," hereinafter referred to as Samar. With respect to Claims 1, 4 and 7, the rejection stated, in part:

. . . Samar discloses a method, program and apparatus for managing identification in a data communications network comprising a user-controlled secure storage device, authority network site, providing information requests, storing the data, enabling the service provider network site to obtain a service. (See page 162, Section 8)

Applicants respectfully traverse the anticipation rejection of each of Claims 1, 4 and 7. Applicants respectfully note that it is not sufficient that Samar teach some authority network site, providing information requests, storing, etc. Rather, the MPEP requires:

"A Claim is anticipated only if each and every element as set forth in the Claim is found, either expressly or inherently described, in a single prior art reference." "The identical invention must be shown in as complete detail as is contained in the ... claim."

MPEP §2131, 8th Ed., Rev. 2, p. 2100-73, (May 2004).

The rejection itself demonstrates that Samar fails to show "The identical invention . . . in as complete detail as is contained in the ... claim." Claim 1 does not recite the rejected "enabling the service provider network site to obtain a service," but rather,

enabling said user-controlled secure storage device to release said user data

The rejection has not even alleged that Samar teaches this element, let alone in as complete detail as is contained in the claim. This alone is sufficient to overcome the anticipation rejection of each of Claims 1, 4 and 7.

In addition, the rejection has not identified what in Samar is considered to be "a user-controlled secure storage device," as recited in each of Claims 1, 4, and 7. Assuming that the rejection is referring to the SSO cookie, the SSO cookie is not user controlled. The rejection has failed to cite any teaching in Samar that even suggests that a user is aware of the cookie, let alone controlling the cookie. In particular, Samar taught that servers controlled the cookie and the information placed in the cookie so Samar not only fails to teach Applicants' invention as recited in these claims, but also teaches away from Applicants' Claim 1. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 1.

Claim 4 is a program storage device corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Claim 7 is a means-plus-function Claim corresponding to method Claim 1 and thus includes substantially the same distinctive feature as Claim 1. Accordingly, the above comments with respect to Claim 1 are incorporated herein by reference for Claims 4 and 7. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 4 and 7.

With respect to Claims 2, 5 and 8, the rejection stated, in part:

. . . Samar discloses a method, program and apparatus for managing identification in a data communications network comprising a user-controlled secure storage device, authority network site, providing information requested, receiving the data in two portions, storing the data, enabling the service provider network site to obtain a service. (See pages 162-163, Section 8 and 9)

Applicants respectfully traverse the anticipation rejection of Claim 2. Again, based upon the above quotation from the MPEP, Applicants respectfully note that it is not sufficient that

Samar teach some authority network site, providing information requests, storing, etc.

Again, the rejection itself demonstrates that Samar fails to show "The identical invention . . . in as complete detail as is contained in the . . . claim." Claim 2 does not recite the rejected "enabling the service provider network site to obtain a service," but rather,

enabling said user-controlled secure storage device to release said user data

The rejection has not even alleged that Samar teaches this element, let alone in as complete detail as is contained in the claim. This alone is sufficient to overcome the anticipation rejection of Claim 2.

Further, Claim 2 does not recite the rejected "receiving the data in two portions," but rather,

receiving user data in response to said enrolling, said user data comprising a first portion and a second portion, said first portion comprising a cryptogram computed based on said second portion

Thus, the user data is received "in response to said enrolling," and Claim 2 specifically defines the first portion of the user data. The rejection of Claim 2 does not even allege that Samar teaches the invention in this level of detail, but rather simply "receiving data in two portions." This level of analysis reduces the explicit Claim language to a gist which is not appropriate for an obviousness rejection, let alone an anticipation rejection. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 2.

Claim 5 is a program storage device corresponding to method Claim 2 and thus includes substantially the same distinctive feature as Claim 2. Claim 8 is a means-plus-

function Claim corresponding to method Claim 2 and thus includes substantially the same distinctive feature as Claim 2. Accordingly, the above comments with respect to Claim 2 are incorporated herein by reference for Claims 5 and 8. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 5 and 8.

With respect to Claims 3, 6 and 9, the rejection stated, in part:

. . . Samar discloses a method, program and apparatus for managing identification in a data communications network presenting an identity credential request and data to be stored to a federated identity server via a client host, receiving an identity credential in response to randomized ID and receiving a logon credential in response to the service request (See page 161, Section 6.3.2, and page 162, Section 7)

Applicants respectfully traverse the anticipation rejection of Claim 3. Again, based upon the above quotation from the MPEP, Applicants respectfully note that the rejection fails to consider explicit Claim limitations and so fails to meet the criterion required for by the MPEP for an anticipation rejection.

Again, the rejection itself demonstrates that Samar fails to show "The identical invention . . . in as complete detail as is contained in the . . . claim." Claim 3 does not recite the rejected "receiving an identity credential in response to randomized ID" but rather,

receiving an identity credential in response to said identity credential request, said identity credential comprising a randomized ID and an identification authority ID, said federated identity server capable of verifying the truthfulness, accuracy and completeness of said data to be stored

The rejection has not even alleged that Samar teaches this element but rather a totally different operation. This alone

is sufficient to overcome the anticipation rejection of Claim 3.

Further, the cited sections of Samar do not include the word "randomized" and do not include any description of "verifying the truthfulness, accuracy and completeness of said data to be stored." Thus, Samar fails to satisfy the requirements of the MPEP.

Finally, the rejection is incomplete, the rejection does not even allege that Samar teaches:

presenting a service request and said identity credential to a service portal, said service portal configured to issue an authentication request to said federated identity server

Thus, the anticipation rejection of Claim 3 is defective for multiple reasons. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 3.

Claim 6 is a program storage device corresponding to method Claim 3 and thus includes substantially the same distinctive feature as Claim 3. Claim 9 is a means-plus-function Claim corresponding to method Claim 3 and thus includes substantially the same distinctive feature as Claim 3. Accordingly, the above comments with respect to Claim 3 are incorporated herein by reference for Claims 6 and 9. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 6 and 9.

With respect to Claims 10, 13 and 16, the rejection stated, in part:

. . . Samar discloses a method for protecting privacy on a data communications network, receiving a user identifier and specific user data associated with the user identifier, the specific user data comprising data about a network user, creating user data based on specific user data, and returning the user identifier and the generalized user data. (See page 160, Section 6)

Applicants respectfully traverse the anticipation rejection of Claim 10. Again, based upon the above quotation from the MPEP, Applicants respectfully note that paraphrasing Applicants' Claim 10 and citing generally to a portion of Samar that extends over more than four columns fails to meet the requirements of the MPEP as quoted above. It is impossible from this rejection to determine what is considered in Samar to teach exactly the method of Claim 10.

In the various transfers illustrated in Fig. 1 in Section 6 of Samar, each transfer shows one set of information being transmitted and a different set of information being returned. In contrast, Claim 10 recites:

receiving a user identifier and specific user data; and
returning said user identifier and said generalized user data. (Emphasis Added)

The rejection has failed to identify any user identifier in Samar that is received and then returned as recited in Claim 10. As noted above, Fig. 1 of Samar does not show such an identifier. Therefore, the rejection fails to meet the requirements of the MPEP as quoted above. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 10.

Claim 13 is a program storage device corresponding to method Claim 10 and thus includes substantially the same distinctive feature as Claim 10. Claim 16 is a means-plus-function Claim corresponding to method Claim 10 and thus includes substantially the same distinctive feature as Claim 10. Accordingly, the above comments with respect to Claim 10 are incorporated herein by reference for Claims 13 and 16. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 13 and 16.

With respect to Claims 12, 15, and 18, the rejection stated, in part:

. . . Samar discloses a method for protecting privacy on a data communications network, storing user logon information for at least one service provider on a user-controlled secure device, the least one service provider server comprising at least one network server providing a service to a user, and logging on the device, and logging on providing access to the least one service provider server.. (See page 161, Sections 6.1.3 and 6.3)

Applicants respectfully traverse the anticipation rejection of Claim 12. Again, based upon the above quotation from the MPEP, Applicants respectfully note that paraphrasing Applicants' Claim 12 and citing generally two different things--"The Brownie Structure" and "Security Analysis"--fails to meet the requirements of the MPEP as quoted above. It is impossible from this rejection to determine what is considered in Samar to teach exactly the method of Claim 12.

In addition, the rejection has not identified what in Samar is considered to be "a user-controlled secure storage device." It cannot be associated with the brownie structure of Samar, because Samar stated "Note that brownies are never returned back to the browser." (Emphasis in original.) Since the browser is on the only user controlled device, Samar taught away from

storing user logon information for at least one service provider server on a user-controlled secure device

as recited in Claim 12 because the brownie is not stored on such a device according to Samar. Similarly, the description in Section 6.3 of "the conditions under which the cookie can be attacked" is unrelated to this Claim element. Finally, neither the brownie nor the security analysis of Samar teaches anything concerning logging on to the user controlled secure device. Accordingly, the cited portions of Samar fail to

satisfy the criterion from the MPEP as quoted above with respect to Claim 12. Applicants respectfully request reconsideration and withdrawal of the anticipation rejection of Claim 12.

Claim 15 is a program storage device corresponding to method Claim 12 and thus includes substantially the same distinctive feature as Claim 12. Claim 18 is a means-plus-function Claim corresponding to method Claim 12 and thus includes substantially the same distinctive feature as Claim 12. Accordingly, the above comments with respect to Claim 12 are incorporated herein by reference for Claims 15 and 18. Applicants request reconsideration and withdrawal of the obviousness rejection of each of Claims 15 and 18.

Claim 19 is rejected under 35 U.S.C. 102(b) as being anticipated by Ming-Chuan Wu et al., "Encoded Bitmap Indexing for Data Warehouses," hereinafter referred to as Wu. The rejection stated in part:

. . . a data structure stored in the memory, the data structure including a bit-mapped in the field determined by whether the user is a member of a group associated with the bit, the mapping for between bits in the field and membership in a group maintained by an aggregation authority. (See Abstract, page 220, and Section 2.1)

Applicants respectfully traverse the anticipation rejection of Claim 19. Again, based upon the above quotation from the MPEP, the requirement for a reference is not that the reference teach some general abstract concept related to the invention, but rather the reference **must show** "The identical invention in as complete detail as is contained in the ... claim."

Wu describes generally the concept of using "simple bitmap indexing and the application domain for which it is ideally suited." The application domain is defined by abstract mathematical concepts and is not related by Wu to "membership

in a group." Further, the rejection cited no teaching of "the mapping for between bits in said field and membership in a group maintained by an aggregation authority," but simply paraphrased the claim language. Accordingly, the rejection failed to meet the criteria required by the MPEP for an anticipation rejection. Applicants request reconsideration and withdrawal of the anticipation rejection of Claim 19.

Claims 1 to 10, 12, 13, 15, 16, 18 and 19 remain in the application. Claims 1 to 9 and 16 are amended. Claims 11, 14 and 17 are cancelled. For the foregoing reasons, Applicant(s) respectfully request allowance of all pending claims. If the Examiner has any questions relating to the above, the Examiner is respectfully requested to telephone the undersigned Attorney for Applicant(s).

CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on July 28, 2005.



Attorney for Applicant(s)

July 28, 2005

Date of Signature

Respectfully submitted,



Forrest Gunnison
Attorney for Applicant(s)
Reg. No. 32,899
Tel.: (831) 655-0880